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Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**ADMINISTRATIVE MOTION OF  
PACIFIC GAS AND ELECTRIC  
COMPANY TO FILE UNDER SEAL  
PORTIONS OF RESPONSE TO  
REQUEST FOR FURTHER  
RESPONSES**

Judge: Hon. William Alsup

1 Pursuant to Criminal Local Rule 56-1, Pacific Gas and Electric Company  
2 (“PG&E”) respectfully submits this Administrative Motion to File Under Seal (the  
3 “Administrative Motion”).

4 PG&E makes the following statement in support of its Administrative Motion:

5 1. Counsel for PG&E has reviewed and complied with Civil Local Rule 79-5 and  
6 Criminal Local Rule 56-1, which require that if a document or portion thereof is sealable,  
7 counsel seeking to file the document or portion of the document under seal must file and serve an  
8 administrative motion for a sealing order, accompanied by a declaration establishing that the  
9 materials are sealable.

10 2. PG&E seeks to file under seal redacted portions of Exhibits 1, 2 and 3 to the  
11 Declaration of Kate Dyer in Support of PG&E’s Administrative Motion to File Under Seal (the  
12 “Dyer Declaration”), which correspond to Exhibits A, B and C to PG&E’s Response to Request  
13 for Further Responses, respectively. Specifically, PG&E seeks to redact for safety reasons the  
14 names of the PG&E employees and contractors identified in these documents. PG&E further  
15 seeks to redact the names, addresses and contact information of PG&E customers in these  
16 documents.

17 3. Criminal Local Rule 56-1 provides that a sealing order may issue where  
18 information, if made available to the public, would compromise the safety of a person. *See*  
19 Criminal Local Rule 56-1(b) and Commentary.

20 4. PG&E believes that the safety of the PG&E employees, contractors and their  
21 family members could be compromised if their names are made publicly available as part of the  
22 PG&E Response.

23 5. As set forth in the Dyer Declaration, PG&E has observed a dramatic increase  
24 in the number of workplace violence events from customers towards employees and contractors,  
25 including during PSPS events. In addition, PG&E executives who have spoken publicly on  
26 behalf of PG&E with respect to its wildfire mitigation efforts have received death threats.

1 Dated: February 12, 2021

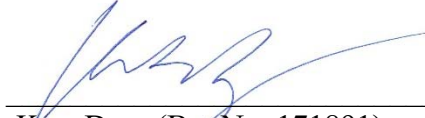
Respectfully Submitted,

2 JENNER & BLOCK LLP  
3 Reid J. Schar (*pro hac vice*)

4 CRAVATH, SWAINE & MOORE LLP  
5 Kevin J. Orsini (*pro hac vice*)

6 CLARENCE DYER & COHEN LLP

7  
8 By:

  
9 Kate Dyer (Bar No. 171891)  
10 Attorneys for Defendant PACIFIC GAS  
11 AND ELECTRIC COMPANY  
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Case No. 14-CR-00175-WHA

~~PROPOSED~~ ORDER  
GRANTING ADMINISTRATIVE  
MOTION OF PACIFIC GAS  
AND ELECTRIC COMPANY TO  
FILE UNDER SEAL PORTIONS  
OF RESPONSE TO REQUEST  
FOR FURTHER RESPONSES

Judge: Hon. William H. Alsup


~~PROPOSED~~ ORDER GRANTING ADMIN. MOTION OF PACIFIC GAS AND ELECTRIC COMPANY TO  
FILE UNDER SEAL PORTIONS OF RESPONSE TO REQUEST FOR FURTHER RESPONSES

1 The Court, having reviewed the Administrative Motion of Pacific Gas and Electric  
2 Company to File Under Seal Portions of Response to Request for Further Responses (the  
3 “Administrative Motion”), and good cause having been shown, hereby GRANTS PG&E’s  
4 Administrative Motion.

5 For the reasons set forth in the Administrative Motion and counsel’s Declaration in  
6 support of the Administrative Motion, the Court finds that portions of Exhibits 1, 2, and 3 to the  
7 Declaration of Kate Dyer in Support of Pacific Gas and Electric Company’s Administrative  
8 Motion, which correspond to Exhibits A, B, and C to PG&E’s Response to Request for Further  
9 Responses, respectively, shall be filed under seal.

10 **IT IS SO ORDERED.**

11  
12 DATED: February 17, 2021.

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15 HON. WILLIAM ALSUP  
16 United States District Judge  
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COMPANY,

Defendant.

CASE NO. CR-14-00175-WHA

**PROOF OF SERVICE**

## PROOF OF SERVICE

I, Anne Hunt, declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San Francisco.

On February 12, 2021, I served a copy, with all exhibits, of the following documents:


- **ADMINISTRATIVE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY TO FILE UNDER SEAL PORTIONS OF RESPONSE TO REQUEST FOR FURTHER RESPONSES**
- **DECLARATION OF KATE DYER IN SUPPORT OF PACIFIC GAS AND ELECTRIC COMPANY'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL [REDACTED]**
- **~~[PROPOSED]~~ ORDER GRANTING ADMINISTRATIVE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY TO FILE UNDER SEAL PORTIONS OF RESPONSE TO REQUEST FOR FURTHER RESPONSES**
- **PROOF OF SERVICE**

**BY PERSONAL SERVICE:** I placed a true copy thereof in a sealed envelope, and caused such envelope to be personally delivered to the addressee(s) noted on the service list.

Hallie Hoffman, AUSA  
US Attorney's Office  
450 Golden Gate Avenue, 11<sup>th</sup> Floor  
San Francisco, CA 94102

The party on whom this electronic mail has been served has agreed in writing to such form of service pursuant to agreement. I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury that the foregoing is true and correct.

Executed on February 12, 2021, at San Francisco, California.

  
Anne Hunt